



# **Title I Services For Children Enrolled in Private Schools**

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**Presented by:**

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# Agenda

- Consultation
- Equitable Services Requirement
- Generating Funds
- Identifying Students for Services
- Public Control Over Funds
- Third Party Providers
- Administrative Costs



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# Law and Resources on Equitable Participation

- Title I, Part A Section 1120
- Final Title I regulations
- Non-regulatory guidance

<http://www.cde.ca.gov/sp/sw/t1/privateschoolsvs.asp>



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# Equitable Services for Children

- Under the Child Benefit Theory, Title I services:
  - Benefit the individual child, not the private school
  - Are provided by the local educational agency (LEA), not the private school
- This theory was developed to comply with the Constitutional prohibition against Federal funding to private schools. **No funds go to private schools.**



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# What is Consultation?

- Discussion between the LEA and private school officials
- An opportunity for expression of views
- On-going coordination between the LEA Title I staff and private school staff



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# Consultation Requirements

- Timely and On-going
  - Must occur during the design, development, and implementation of the program
- Meaningful
  - Not unilateral offer by the LEA or a demand by the private school officials without an opportunity for discussion
- Must include meetings



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# Consultation Requirements (Cont.)

- How children's needs will be identified
- What services will be offered
- How and when decisions about the delivery of services will be made
- How, where, and by whom services will be provided
- How services will be assessed and improved based upon assessment results
- Size and scope of services



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# Consultation Requirements (Cont.)

- Proportion of funds allocated
- Method for determining poverty data
- Equitable services to teachers and parents of participants





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# Consultation Requirements (Cont.)

## Third party providers:

- Thorough consideration of private school officials' views
- Written analysis from LEA, if denying services from a third party provider requested by the private school



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# Consultation Requirements (Cont.)

## Documentation:

- Written affirmation:
  - Signed by private school officials
  - When planning and design of program completed



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# Equitable Service Requirements

- An LEA must only use Title I funds to meet the needs of the Title I participants.
- Provide supplemental educational services and not supplant the basic program.
- An LEA **cannot** use any Title I funds to meet the general needs of a private school.



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# Equitable Service Requirements (Cont.)

The LEA must:

- Provide children in private schools with an opportunity to participate
- Meet the equal expenditure requirements for instruction, professional development, and parent involvement



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# Equitable Service Requirements (Cont.)

- Assess student needs and the effectiveness of the Title I program
- Begin the Title I program at the same time as the program for children in public schools.



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# Generating Funds

General formula based on the number of:

- Private school students
- From low-income families
- Who reside in Title I participating public school attendance area of your district



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# Generating Funds (Cont.)

Low-income public and private school children residing in the same Title I attendance areas generate the same per-pupil amount (PPA).



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# Generating Funds (Cont.)

To calculate:

- Multiply the PPA by the number of low-income private school children who live in a Title I public school attendance area of your district.
- This will equal the instructional funds for the Title I program for eligible private school children.





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# Multiple Funding Levels

If a district uses multiple funding levels for schools (by grade span or low-income):

- Private school students from low-income families generate varying amounts, depending on where they live.



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# Multiple Funding Levels (Cont.)

Public School A attendance area	\$800 PPA	5 low-income students at Private School J	\$4,000
Public School B attendance area	\$700 PPA	5 low-income students at Private School J	\$3,500



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# Reservation of Funds

LEAs must provide equitable participation from funds reserved for the purpose of district-wide instructional activities and/or programs.



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# Reservation of Funds (Cont.)

Applies to reservations for:

- Professional development
- Parent involvement
- Summer school
- Instructional activities



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# Reservation of Funds (Cont.)

Does not apply to funds reserved for:

- Program Improvement
- Homeless education
- Pre-Kindergarten
- Neglected or delinquent



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# Equitable Services Example

## District-wide Instructional Activities

In participating public school attendance areas:				
Number of private school students from low-income families	÷	Total number of public and private school students from low-income families	=	Proportion of reservation
Proportion of reservation	X	Amount of reservation	=	Amount of funds for equitable services**
**May be added to the instructional funds generated by low-income private school students				



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# Eligibility for Services

LEA selects participants from names of eligible children provided by private school officials.



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# Eligibility for Services (Cont.)

## Private school children who:

- Reside in Title I participating public school attendance area

**and**

- Are failing or at risk of failing to meet academic performance standards





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# Eligibility for Services (Cont.)

Poverty is not a criterion for receiving Title I, Part A services.



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# Student Selection Criteria

Student selection for services based on:

- Multiple measures
- Educationally related
- Developmentally appropriate criteria



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# Student Selection Criteria (Cont.)

Criteria must include:

- Achievement tests (a standardized test) and may include:
  - Teacher referral and recommendation
  - Academic performance in the regular classroom



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# Student Selection Criteria (Cont.)

Children from preschool through grade two are selected solely on the basis of such criteria as teacher judgment, interviews with parents, and developmentally appropriate measures.

(See Section 1115[b][1] and [2].)



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# Eligibility for Services (Cont.)

## Question?

If an LEA is allocating Title I funds through its middle grades, but not funding public high schools, are students from private high schools eligible to participate in the Title I program?



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# Eligibility for Services (Cont.)

## Answer

No. In this case, if the private school students were attending public schools they would not be receiving Title I services; therefore, these students would not be served.



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# Public Control of Funds

LEA retains control of:

- Funds (including contracts)
- Materials
- Equipment (must be labeled)
- Property (must be labeled)



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# Program Responsibility

The Title I program for students in private schools is the district's program for the students who reside within the district's Title I attendance areas, but attend private schools.





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# Program Responsibility (Cont.)

- The LEA is required to develop and implement the Title I program that meets the needs of the Title I students.
- The LEA **cannot** delegate its responsibility to the private school officials.



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# Roles for Private School Officials

- Participate in consultation
- Provide poverty data to the LEA
- Provide lists of eligible children
- Suggest program designs and modifications



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# Roles for Private School Officials (Cont.)

- Provide a dedicated space for Title I services, if possible
- Private school officials have no authority to make final decisions



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# Delivery of Services

Who is responsible for providing these services?

- The LEA in which the child resides is responsible for providing Title I supplemental services.



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# Service Delivery Options

- Direct instruction from the LEA of residence
- Another LEA
  - Interagency agreement
  - PPA the rate of the district of residence



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# Service Delivery Options (Cont.)

## Third Party Provider Contract:

- Provider must be independent of the private school.
- Administrative costs must be paid from the amount reserved for Title I, Part A administration and not from the funds generated for services at the private schools.



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# Service Delivery Options (Cont.)

## Third Party Provider Contract:

- Program description
- Cost break down by program components (i.e., instruction, parent involvement, professional development, and administration)
- Invoice/payment break down by program component



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# Administrative Costs

Administrative costs must be paid from the Title I funds set aside for administrative purposes and not from the funds generated by the low income counts at the private schools.





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# Private School Poverty Data

- May be collected annually or biennially.
- May be provided by the private schools or collected directly from the parents via a parent income survey.
- LEA must obtain poverty data on resident low-income children attending private schools located within the boundaries of **other** LEAs.



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# Private School Poverty Data (Cont.)

LEA may use the following methods to obtain poverty data about private school students:

- Data from the same source used by the LEA
- Comparable data, such as home survey
- Survey with extrapolation
- Proportionality



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# Transferability

- If an LEA transfers funds into the Title I program from a fund that requires equitable participation, then the LEA must consult with private school officials prior to transferring funds.
- Funds may not be transferred for the sole purpose of meeting the needs of the private school children.



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# Carryover

- Generally carryover funds are part of the **LEA's** total resources for the next school year.
- LEA officials have flexibility in how to use carryover funds; however, they must ensure that the equitable services requirements are met as applicable.



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# Carryover (Cont.)

If equitable services were not provided, the LEA must carry over the unspent funds to the next year's program for private school participants.



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# Services Must Be

- Secular
- Neutral
- Non-Ideological
- Supplemental



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# Types of Services (Examples)

- Direct instruction
- Extended day program
- Take home computers
- Computer-assisted instruction
- Family literacy

Providing only materials is not an allowable Title I program



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# Equitable Participation for Teachers and Families

From funds reserved for professional development (§1119) and parental involvement (§1118), an LEA must provide equitable services to private school teachers and families of participating private school children.





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# Professional Development

- The LEA must consult with private school officials prior to the LEA designing and implementing professional development activities.
- Professional Development (PD) must be aligned to meet the needs of the Title I participants.



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# Professional Development (Cont.)

PD must be designed to increase the private school teachers' skills and knowledge about how to better instruct the Title I participants at the private school.



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# Equitable Services for Teachers

## Example of Calculation

5,000 (Private school students from low-income families)	÷	100,000 (Total number of public and private school students from low-income families)	=	5% Proportion of reservation
5% Proportion of reservation	x	\$360,000 Amount of District's reservation for professional development under §1119	=	\$18,000 Amount of funds for equitable services*
*The LEA must provide professional development activities for private school teachers of participants with the \$18,000				



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# Parent Involvement

Title I, Part A Section 1118 requires:

- Activities designed in consultation with private school officials and parents
- Annual parent Title I meeting
- Parent involvement activities
- Parent input on Title I program



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# Equitable Services for Parents

5,000 (Private school students from low-income families)	÷	100,000 (Total number of public and private school students from low-income families)	=	5% (Proportion of reservation)
5% (Proportion of reservation)	×	\$60,000 (Amount of District's reservation for parental involvement activities under §1118)	=	\$3,000 (Amount of funds for equitable services*)
*The LEA must provide parental involvement activities with \$3,000 generated				



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# Annual Evaluation

- The LEA is accountable for the annual progress of Title I services at private schools.
- The LEA must assess all students receiving Title I services.
- Type of student assessment is determined during consultation.



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# Annual Evaluation (Cont.)

- Test results are used for Title I purposes only.
- Results of the assessments are used to modify and improve Title I services.



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# Annual Evaluation (Cont.)

- Assessment instrument
- Performance standard
- Annual progress measure





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# Annual Evaluation (Cont.)

- Assessment instrument to be used (specify name of the test)
- Determination of performance standards (e.g., test scores will increase by 5 percentile points)
- Annual progress measure (e.g., 70 percent of students served will gain 5 percentile points)



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# Annual Evaluation (Cont.)

- Percent of students achieving the performance standard (e.g., 50 percent of the students served, gained 5 percentile points)
- Review and analyze data
- Modify Title I program per data analysis



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# **“Off the Top” Costs for Capital Expenditures**

An LEA may reserve “off the top” funds for:

- Expenditures for non-instructional goods and services, such as lease, or renovation of real or personal property, including mobile educational units and leasing of neutral sites or spaces



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# **“Off the Top” Costs for Capital Expenditures (Cont.)**

An LEA may reserve “off the top” funds for:

- Non-instructional technicians
- Insurance and maintenance costs



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# Complaint Process

Title I, Part A Section 1120 (b) states:

“A private school official shall have the right to complain to the State Educational Agency that the LEA did not engage in a meaningful and timely consultation or did not give due consideration to the views of the private school official.”



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# Complaint Process (Cont.)

To file a complaint with the California Department of Education (CDE), LEAs and private schools:

- Follow Uniform Complaint Procedures
- Provide basis for complaint to CDE's Complaints Management Office at 916-319-0929



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# **CDE Title I Services for Students in Private Schools Web page is located at**

**<http://www.cde.ca.gov/sp/sw/t1/privateschoolsvs.asp>**



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# Questions

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